

REMARKS

After entering the above amendments, claims 4-10, 13-18, 21, 25-31, and 34-39 will be pending. Reconsideration and allowance of the current application are requested in light of the above-marked amendments and the foregoing remarks.

Summary of Rejections. The Office has rejected 4-10, 13-18, 21, 25-31, and 34-39 under 35 U.S.C. §102(e) as allegedly being anticipated by U.S. Patent No. 6,643,661 to Polizzi (hereinafter "Polizzi").

Summary of Amendments. With this amendment, claim 34 has been amended to correct a typographical error. This amendment does not change the scope of the claims.

Rejections under 35 USC §102

Claims 4-10, 13-18, 21, 25-31, and 34-39 stand rejected under 35 U.S.C. §102(e) as allegedly being anticipated by Polizzi. This rejection is respectfully traversed. To present a valid anticipation rejection under 35 U.S.C. §102, the Office must identify a single prior art reference in which "each and every element as set forth in the claim is found, either expressly or inherently described." MPEP §2131 quoting *Verdegaal Bros. v. Union Oil Co. of California*, 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987). Furthermore, "the identical invention must be shown in as complete detail as is contained in the ... claim." MPEP §2131.01 quoting *Richardson v. Suzuki Motor Co.*, 868 F.2d 1226, 1236, 9 USPQ2d 1913, 1920 (Fed. Cir. 1989). The rejections over Polizzi fail to satisfy this burden with regards to the currently pending claims for at least the following reasons.

Applicant respectfully disagrees with the statements in the Office Action of March 18, 2008 at least with regards to Polizzi's alleged anticipation of the instantly claimed navigation connectors and requests that the Examiner reconsider his position. Polizzi teaches a portal system 120 that serves as a common interface between various back-end databases 135, 140, 145, & 150 and a user

100 (see e.g. col. 4, lines 59 to 65 and FIG. 1). The portal system 120 can include a service broker 125 and a plurality of service agents including an event server 215, an authentication server 220, a name server 225, a job server 230, a repository 235, and a knowledge server 240 that includes a search server 245 and a crawl server 250 (see e.g. col. 5, lines 24-29).

The currently claimed subject matter is clearly differentiated from the disclosure of Polizzi in that the one or more additional programmable machines (that are explicitly separate and distinct from the first programmable machine upon which the navigation service module resides) implement the connector interface. Polizzi does not teach or disclose any aspect of the navigation method or system being implemented on the machines that host the back-end databases 135, 140, 145, & 150. However, the Office has apparently alleged that, because col. 5 lines 29-34 of Polizzi states that the functional blocks in FIG. 2 “may be implemented on separate computer platforms or on the same computer platform,” the Polizzi disclosure can be taken as anticipatory of any possible specific configuration of a claimed computer system or method that accomplishes a similar end result even if the specific configuration and actual operation of the claimed computer system or method differ and are not actually disclosed. This position is clearly in error. Polizzi's generic disclosure that various parts of the system can be implemented on separate computer platforms does not rise the level of detail required under 35 U.S.C. §102 to properly anticipate the claim limitation that the navigation connectors are provided by a connector interface that is implemented on the additional programmable machines that provide the application sources.

Additionally, the Office has apparently continued to allege that the navigation connectors recited in the instant claims are equivalent to the “link to a job” that is “connected to a job server” disclosed in Polizzi (see e.g. the rejection of claim 34 as stated on page 14 of the pending office action. The passages from Polizzi that are cited in the statement of the rejections of claims 34-36

(e.g. figures 2, 3, and 7, col. 5 lines 50-51, and col. 17 lines 24-65) clearly contradict the Office's allegations that these links are equivalent to the navigation connectors instantly claimed. As a first point, the links are provided to the user's portal web page and provide a connection to a job server. The request to process the job is handled by the service broker 125 (which Polizzi does not disclose as being situated on the database machines, but rather on the portal system 120). The service broker 125 then handles the job which accesses the appropriate back-end database or databases to retrieve the data needed to fulfill the job. Because all of the interfacing with the disparate back-end databases is handled at the portal system in Polizzi, information about each back-end database that is to be accessed must be programmed into the portal system. In contrast, because the instantly claimed subject matter includes a connector interface that is implemented on the machine that hosts an application source that is to be accessed via the navigation service, the navigation service need not be programmed with information that is specific to the operating system of the application source.

For the Office to allege that the functions of Polizzi's job server could be implemented on the machines hosting the individual back-end databases 135, 140, 145, & 150, requires not just an impermissibly expansive reading of Polizzi's disclosure but also a contradiction of the explicit teachings of Polizzi. As an example, Polizzi notes at col. 4 lines 65 to col. 5 line 7 that the portal system 120 serves as a common interface that retrieves data from the back-end databases and then processes the data on the portal system 120. The back end databases are clearly defined as separate from the portal system (e.g. see col. 5 lines 23-24). In light of this disclosure, the statement at the end of the same paragraph regarding implementation of various aspects of the portal system on separate computer platforms is clearly neither anticipatory nor suggestive of any function of the portal system residing on the back-end databases.

For at least these reasons, withdrawal of the pending rejections of claims 34-36 and all of the claims that depend therefrom and therefore include the limitations thereof under 35 U.S.C. §102 is respectfully requested.

As a further point, Applicant also notes that claim 4 (which depends from and includes the limitations of claim 35) further recites that the navigation service accepts a navigation connector by receiving a navigation request from the navigation connector. The Office has alleged that this claim element is anticipated by Polizzi's disclosure of a user defining a link to an application source. This assertion is without basis in fact given that claim 35, from which claim 4 depends, clearly requires that the navigation connectors are provided to the navigation service module by the connector interface that is implemented on the one or more additional programmable machines upon which one of the one or more application sources resides. Applicant respectfully submits that Polizzi's alleged disclosure of users defining links to jobs in a job server cannot reasonably be argued to anticipate the method recited in claim 4. Polizzi fails to even disclose the same operation that is recited in claim 4, and certainly therefore fails to provide a legitimate basis for a rejection under 35 U.S.C. §102.

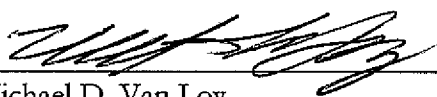
CONCLUSION

On the basis of the foregoing amendments, the pending claims are in condition for allowance. It is believed that all of the pending claims have been addressed in this paper. However, failure to address a specific rejection, issue or comment, does not signify agreement with or concession of that rejection, issue or comment. In addition, because the arguments made above are not intended to be exhaustive, there may be reasons for patentability of any or all pending claims (or other claims) that have not been expressed. Finally, nothing in this paper should be construed as an intent to concede any issue with regard to any claim, except as specifically stated in this paper.

The Commissioner is hereby authorized to charge the additional claim fee and any additional fees that may be due, or credit any overpayment of same, to Deposit Account No. 50-0311, Reference No. 34874-073/2003P00062US. If there are any questions regarding this reply, the Examiner is encouraged to contact the undersigned at the telephone number provided below.

Respectfully submitted,

Date: May 19, 2008



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